

EXHIBIT 31

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Pages 1 - 101

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable William H. Alsup, Judge

WAYMO LLC,)	
)	
Plaintiff,)	
)	
VS.)	NO. C 17-00939 WHA
)	
UBER TECHNOLOGIES, INC.; OTTO)	
TRUCKING LLC; and OTTOMOTTO)	
LLC,)	
)	
Defendants.)	
)	

San Francisco, California
Thursday, June 29, 2017

TRANSCRIPT OF PROCEEDINGS

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40 **BY: JOHN LEE COOPER**

1 discovery, too.

2 You know, we're going to we're going to issue discovery
3 requests on this bonus issue. And we have issued plenty of
4 other discovery requests about themes that we -- things that we
5 need to develop in this case; our facts. And we're about to
6 depose people without those documents.

7 **THE COURT:** Well, I want Mr. Verhoeven to know he
8 will be in big trouble.

9 And if -- even if I were to allow you to put on some kind
10 of stonewalling testimony, if you stonewalled, at least they're
11 going to get to reply with that kind of stonewalling evidence
12 before the jury. And then -- poof! -- up goes all of your
13 theory.

14 **MR. VERHOEVEN:** And by the same token --

15 **THE COURT:** You can't have it both ways. This is
16 America. You don't get it both ways.

17 **MR. VERHOEVEN:** By the same token, I would argue,
18 Your Honor, that if they're going to try to present to the jury
19 that they did such a great job looking for any stolen
20 documents, and they provided us --

21 I mean, they say they're going to have their outside
22 counsel testify about all of the things they've taken. They
23 say they're going to call us -- outside counsel -- to question
24 us about our inspections. They say that in response to your
25 Question 9.

1 ahead. File it next week. Make sure. Make sure it's a strong
2 motion. There's a certain limit. At some point, I'm going to
3 get tired of hearing motions from Uber or from Waymo, and we're
4 just going to say the jury's going to sort it out. So if you
5 want to use up one of your bullets on this, go ahead.

6 **MS. DUNN:** Thank you, Your Honor.

7 **THE COURT:** I think we're done for now. And we have
8 a plan to muddle through and limp along. So good luck to both
9 sides. See you soon.

10 (At 10:18 a.m. the proceedings were adjourned.)

11 I certify that the foregoing is a correct transcript from the
12 record of proceedings in the above-entitled matter.

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June 29, 2017

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Signature of Court Reporter/Transcriber
Lydia Zinn

Date

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